



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

October 18, 2024

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Lopez Reyes, et al.*, S8 23 Cr. 501 (JPC)
 United States v. Espinal, et al., 23 Cr. 577 (JPC)
 United States v. Paulino, 24 Cr. 13 (JPC)
 United States v. Jimenez, et al., 24 Cr. 177 (JPC)
 United States v. Brito, et al., 24 Cr. 430 (JPC)**

Dear Judge Cronan:

The Government respectfully submits this letter in response to the Court's order, dated October 15, 2024, ordering the Government to advise whether it intends to proceed with prosecuting the charges brought against the defendants in indictments *United States v. Espinal, et al.*, 23 Cr. 577 (JPC), *United States v. Paulino*, 24 Cr. 13 (JPC), *United States v. Jimenez, et al.*, 24 Cr. 177 (JPC), and *United States v. Brito, et al.*, 24 Cr. 430 (JPC) (collectively the "Prior Indictments"), in light of the charges brought in the superseding indictment *United States v. Lopez Reyes, et al.*, S8 23 Cr. 501 (JPC) (the "S8 Indictment"). The Government views the Prior Indictments as valid but superseded by the S8 Indictment. At a future date, the Government intends to move to dismiss the charges in the Prior Indictments, as it would customarily do with any counts still open at the resolution of a matter. In the meantime, the Government would request, with the consent of the defendants, that all deadlines related to the Prior Indictments, including trial dates, be adjourned *sin die*.


Respectfully submitted,

DAMIAN WILLIAMS
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by: /s/
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All deadlines related to the prosecutions of Wellington Eustate Espinal and Heriberto Eustate Espinal in 23 Cr. 577, Luis Paulino in 24 Cr. 13, Edward Eustate Jimenez and Wilianyi Almanzar Polanco in 24 Cr. 177, and Miguel Concepcion Brito, Cynthia Onega, and Jose Concepcion Brito in 24 Cr. 430, are adjourned *sine die*.

SO ORDERED.
Date: October 18, 2024
New York, New York


JOHN P. CRONAN
United States District Judge